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March 17, 2023

Via ECF

Hon. Philip M. Halpern
Federal Building and Courthouse
300 Quarropas Street, Room 530
White Plains, New York 10601

**Re: *Zappier v. Project Veritas, et al.*, Case No. 22-cv-06709;
Request For Extension Of Time To File Motion To Dismiss.**

Dear Judge Halpern:

We represent Defendant, Project Veritas in the above-referenced action. We write to respectfully request an extension of time to file the briefing on the motion to dismiss by Project Veritas and Defendant, Michael Spadone. Mr. Spadone joins in this request.

I have become ill, and in light of the filing deadline on Monday, March 20, 2023, Project Veritas requests a reasonable extension of time to file, to Thursday, March 23, 2023. This is Project Veritas' first request for an extension of time. Plaintiff consents to this request.

We thank the Court for its attention to this matter.

Respectfully,

/s/ Justin T. Kelton

Justin T. Kelton

cc: All appearing counsel (via ECF)